ESTTA Tracking number:

ESTTA276434 04/06/2009

Filing date:

### IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91182589
Party	Plaintiff Vinedos y Bodegas Corpora S.A.
Correspondence Address	Ralph H. Cathcart 26 West 61st Street New York, NY 10023 UNITED STATES rcathcart@ladas.com, rroa@ladas.com, ssilverstein@ladas.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Ralph H. Cathcart
Filer's e-mail	rcathcart@ladas.com, rroa@ladas.com, probinson@ladas.com
Signature	/Ralph H. Cathcart/
Date	04/06/2009
Attachments	Motion on Consent for Extension of Time to Submit Initial Disclosures - Bodegas Portia.pdf ( 3 pages )(66761 bytes )

## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

		X	
Viñedos y Bodegas Corpora S.A.,		:	<b>Opposition No. 91,182,589</b>
		:	Opposition No. 91,186,552
	Opposer,	: :	Opposition No. 91,188,190 Cancellation No. 92,048,912
	v.	: :	(As Consolidated)
Bodegas Portia, S.L.,		:	
		:	
	Applicant.	: X	

# MOTION ON CONSENT FOR EXTENSION OF TIME TO SUBMIT INITIAL DISCLOSURES

Opposer hereby respectfully requests, with Applicant's consent, a thirty (30) day extension of time to submit Initial Disclosures, currently due April 4, 2008 (Saturday) thus on April 6, 2008.

The additional time is needed so that counsel can obtain the requested information from Opposer, located in Chile. Counsel has experienced difficulty obtaining the information from Opposer, compounded by e-mail disruption.

The schedule in these consolidated proceedings would be reset as set forth below:

Defendant's Pretrial Disclosures:

Initial Disclosures Due:	May 4, 2009
Expert Disclosures Due	September 1, 2009
Discovery Closes:	October 1, 2009
Plaintiff's Pretrial Disclosures:	November 15, 2009
Plaintiff's 30-day Trial Period Ends:	December 30, 2009

January 14, 2010

Defendant's 30-day Trial Period Ends:

February 28, 2010

Plaintiff's Rebuttal Disclosures:

March 15, 2010

Plaintiff's 15-day Rebuttal Period Ends:

April 14, 2010

Counsel for applicant, Justin R. Young, Esq., has consented to the extension requested herein.

Respectfully submitted,

LADAS & PARRY LLP

Attorneys for Opposer,

Viñedos y Bodegas Corpora, S.A.

Dated: April 6, 2009

By: \_

Ralph H. Cathcart 26 West 61<sup>st</sup> Street

New York, New York 10023

(212) 708-1860 (Our Ref: 070156)

#### **CERTIFICATE OF TRANSMISSION**

I, Reinaldo M. Roa, hereby certify that a copy of the foregoing MOTION ON CONSENT FOR EXTENSION OF TIME TO SUBMIT INITIAL DISCLOSURES has been electronically transmitted to the United States Patent and Trademark Office on the date indicated:

Dated: April 6, 2009

Reinaldo M. Roa

### **CERTIFICATE OF SERVICE**

I, Reinaldo M. Roa, hereby certify that a copy of the foregoing MOTION ON CONSENT FOR EXTENSION OF TIME TO SUBMIT INITIAL DISCLOSURES was served on the following person(s) by e-mail, as follows:

Justin R. Young, Esq. Dineff Trademark Law Limited 160 N. Wacker Chicago, IL 60606

Dated: April 6, 2009

Reinaldo M. Roa